

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 19-219
	)	
MUSTAFA MOUSAB ALLOWEMER	)	

**MOTION TO EXTEND THE TIME FOR FILING PRETRIAL MOTIONS**

NOW COMES the Defendant Mr. Mustafa Mousab Alowemer, through his counsel, Assistant Federal Defender Andrew Lipson, requesting that this Court extend the time for filing pretrial motions from March 9, 2020 to June 8, 2020. In support of this Motion, counsel provides the following information:

1. Mr. Alowemer was arraigned on July 24, 2019 on an indictment charging Mr. Alowemer with violations of 18 U.S.C. § 2339B(a)(1) and 18 U.S.C. § 842(p)(2)(A).

2. Pursuant to Local Rule 12, and prior Court Order, certain types of pretrial motions are due on March 9, 2020.

3. During the course of undersigned counsel's representation of Mr. Alowemer, there have been nine (9) productions of evidence by the government. Those productions contain over 10,000 pages of social media and electronic communications records. Additionally, the productions include forensic copies of cell phones and other electronic media, which alone contain many gigabytes of data. A substantial amount of those productions to date contain Arabic

communications, Mr. Alowemer's native language. Defense counsel has retained the services of a translator to permit counsel to meaningfully review the evidence and effectively advise Mr. Alowemer about the nature of the government's charges and strength of the evidence in this case.

4. Mr. Alowemer is a native of Syria. In addition to English not being his native language, he is not accustomed to the United States legal system, and in particular, the criminal justice process. Defense counsel has retained the services of interpreters to assist in all legal communications with Mr. Alowemer, but those communications necessarily are more difficult to coordinate and also take more time than the typical representation in a criminal case in federal court. That Mr. Alowemer is currently detained in Mahoning County Jail in Ohio only serves to demand more coordination and time to effectively communication with him.

5. Mr. Alowemer is a Syrian refugee, having fled his home with his family because of the Syrian civil war. In addition to the government's charges, which carry substantial penalties if Mr. Alowemer is convicted, there are immigration consequences that may also result from this case. Defense counsel is working through those related immigration issues with Mr. Alowemer, which only serve to make defense counsel's advice more complex than the typical representation in a criminal case in federal court.

6. Accordingly, additional time is needed to review discovery materials, conduct client consultation, and investigate the facts and law before Mr.

Alowemer can make an informed decision concerning the filing of pretrial motions.

7. As stated at the status conference held by the Court on February 6, 2020, the government has no objection to the relief sought herein.

WHEREFORE, Mr. Alowemer respectfully requests that the deadline for filing pretrial motions be extended from March 9, 2020 to June 8, 2020.

Respectfully submitted,

**s/ Andrew Lipson** \_\_\_\_\_

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